

## REMARKS

Applicant respectfully requests re-consideration of the application in view of the arguments presented below.

### Summary of Office Action

Claims 1-20 are pending.

Claims 1-7 and 11-18 were rejected under 35 U.S.C. § 102 as being anticipated by Pessl, et al. "Proceedings of the 27<sup>th</sup> European Conference on Solid-State Circuits", ESSCIRC 2001, Sept. 18-20, 2001 ("Pessl").

Claims 8-9 and 19-20 were rejected under 35 U.S.C. § 103 as being unpatentable over Pessl in view of U.S. Patent No. 5,835,533 of Booth ("Booth").

Claim 10 is rejected under 35 U.S.C. § 103 as being unpatentable over Pessl in view of U.S. Patent No. 6,295,343 of Hjartarson, et al. ("Hjartarson").

### Response to 35 U.S.C. § 102 rejections

Claims 1-7 and 11-18 were rejected under 35 U.S.C. § 102 as being anticipated by Pessl.

Applicant respectfully submits that Pessl does not teach or disclose a) *a driver combining a downstream voice signal in a voiceband range and a downstream data signal in a non-voiceband range into a common downstream signal for a subscriber line;* and b) *receiver circuitry coupled to separately provide an upstream data signal and an upstream voice signal from an upstream signal carried by the subscriber line, wherein the driver and receiver circuitry reside on a same integrated circuit die.*

The Infineon IVAX chipset consists of four integrated circuits. Notably, the Analog Front End includes the codec but not the SLIC or linefeed driver. (Pessl, pg. 117, col. 2; Fig. 2). The blocks primarily illustrate DAC or ADC conversion and filters but no drivers or interface to the subscriber line. Clearly, given the number of signal lines illustrated about the AFE there are other components (not illustrated) for interfacing the AFE to the subscriber line.

As noted by the text accompany Figure 2, Pessl's AFE does not include SLIC or linefeed driver circuitry. Moreover, the downstream voice and data are provided as *separate* outputs from Pessl's AFE. Thus one cannot even infer that there is one driver combining the downstream voice and data signals.

Even if one assumes *arguendo* that the block diagram of Fig. 2 discloses receiver circuitry coupled to provide an upstream data signal and an upstream voice signal from an upstream signal carried by the subscriber line, there is a complete lack of disclosure of *a driver combining a downstream voice signal in a voiceband range and a downstream data signal in a non-voiceband range into a common downstream signal for a subscriber line.*

Given that drivers are *expressly omitted* from the block diagram of Pessl (p. 117, col. 2), applicant submits that the Pessl does not teach or disclose such a driver residing on the same integrated circuit die as the receiver. Pessl explicitly teaches away from such a configuration.

Thus Pessl does not teach or disclose a) *a driver combining a downstream voice signal in a voiceband range and a downstream data signal in a non-voiceband range into a common downstream signal for a subscriber line;* and b) receiver circuitry coupled to separately provide an upstream data signal and an upstream voice signal from an upstream signal carried by the subscriber line, *wherein the driver and receiver circuitry reside on a same integrated circuit die.*

In contrast, claim 1 includes the language:

1. A subscriber line interface circuit apparatus, comprising:  
*a driver combining a downstream voice signal in a voiceband range and a downstream data signal in a non-voiceband range into a common downstream signal for a subscriber line; and*  
*receiver circuitry coupled to separately provide an upstream data signal and an upstream voice signal from an upstream signal carried by the subscriber line, wherein the driver and receiver circuitry reside on a same integrated circuit die.*

(Claim 1)(*emphasis added*)

With respect to claim 13, the same arguments made with respect to claim 1 similarly apply. Applicant notes that claim 13 further includes the metering signal in the signals combined and driven onto the subscriber line. Pessl does not

teach or disclose a) *driver circuitry for combining and driving a downstream voice signal, a metering signal and a downstream data signal onto a subscriber line;* and b) receiver circuitry for receiving and separating an upstream signal from the subscriber line into an upstream voice signal and an upstream data signal, *wherein the driver and receiver circuitry reside on a common integrated circuit die.*

In contrast, claim 13 includes the language:

13. A subscriber line interface circuit apparatus, comprising:  
*driver circuitry for combining and driving a downstream voice signal, a metering signal and a downstream data signal onto a subscriber line; and*  
*receiver circuitry for receiving and separating an upstream signal from the subscriber line into an upstream voice signal and an upstream data signal, wherein the driver and receiver circuitry reside on a common integrated circuit die.*

(Claim 13)(*emphasis added*)

Thus claims 1 and 13 are not anticipated under 35 U.S.C. § 102 by Pessl. Given that claims 2-12 depend from claim 1 and claims 14-20 depend from claim 13, applicant submits claims 2-12 and 14-20 are likewise not anticipated by the cited reference.

Applicant respectfully submits the rejections under 35 U.S.C. § 102 have been overcome.

### **Response to 35 U.S.C. § 103 rejections**

Claims 8-9, 10, and 19-20 were rejected under 35 U.S.C. § 103 over Pessl in view of Booth or Hjartarson.

Applicant submits that claims 8-9, 10, and 19-20 are all dependent claims. None of Booth or Hjartarson resolves the deficiencies of Pessl argued above with respect to the 35 U.S.C. § 102 rejections. Accordingly, claims 1 and 13 are patentable under 35 U.S.C. § 103 over Pessl in view of either Booth or Hjartarson.

Given that claims 2-12 depend from claim 1 and claims 14-20 depend from claim 13, applicant submits that claims 2-12 (i.e., including claims 8-9 and 10) and

claims 14-20 (i.e., including claims 19-20) are likewise patentable under 35 U.S.C. § 103 over the cited references in any combination.

Applicant respectfully submits that the rejections under 35 U.S.C. § 103 have been overcome.

### **Conclusion**

In view of the arguments presented above, applicant respectfully submits the applicable rejections and objections have been overcome. Accordingly, claims 1-20 should be found to be in condition for allowance.

If there are any issues that can be resolved by telephone conference, the Examiner is respectfully requested to contact the undersigned at (512) 858-9910.

Respectfully submitted,

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